

# **EXHIBIT E**

IN THE JUSTICE COURT OF NOXUBEE COUNTY, MISSISSIPPI

LEE FLORA WAYNE

PLAINTIFF

VS.

CIVIL ACTION NO. 1002-240

EQUIFAX INC. BY AND THROUGH  
REGISTERED AGENT THE PRENTICE-HALL  
CORPORATION SYSTEM, INC.

DEFENDANT

**MOTION TO STAY ALL RELATED EQUIFAX ACTIONS**  
**CURRENTLY PENDING BEFORE THIS COURT**

This Court recently heard 13 data breach cases against Equifax, and Equifax has appealed those judgments to the Circuit Court of Noxubee County. Counsel for the Plaintiffs has filed 61 other cases involving the exact same data breach.

Equifax respectfully asks the Court to stay the trial of these 61 other cases until the Circuit Court rules on the appeals. If Equifax wins its 13 appeals, then there is no point in these 61 identical cases moving forward. If Equifax loses its 13 appeals, then it will impact whether Equifax will contest the remaining 61 identical cases. A stay will save the Court time and money either way.

A stay will not hurt the plaintiffs in any of the 61 new cases. If a stay is not granted and those cases go forward and plaintiffs win, then Equifax will appeal and post bond. This means that even without a stay, the plaintiffs will get no money until the appeal is decided (if Equifax loses its appeals). Therefore, a stay will not delay the plaintiffs collecting any money.

Equifax therefore asks that the Court stay the following 61 cases:

1. *Shonreka Hall v. Equifax Inc.*; Cause No. 1002-245;
2. *Jackie Ivy v. Equifax Inc.*; Cause No. 1002-244;
3. *Pamela King v. Equifax Inc.*; Cause No. 1002-243;
4. *Gloria McMillian v. Equifax Inc.*; Cause No. 1002-242;
5. *Ruth Skinner v. Equifax Inc.*; Cause No. 1002-241;
6. *Lee Flora Wayne v. Equifax Inc.*; Cause No. 1002-240;
7. *Annie Allen v. Equifax Inc.*; Cause No. ; 1002-250;
8. *Colanda Baker v. Equifax Inc.*; Cause No. 1002-253;

9. *Rochele Barnett v. Equifax Inc.*; Cause No. 1002-251;
10. *Patricia Brooks v. Equifax Inc.*; Cause No. 1002-252;
11. *Ashley Calhoun v. Equifax Inc.*; Cause No. 1002-269;
12. *Jasmine Calhoun v. Equifax Inc.*; Cause No. 1002-268;
13. *Teronto Calhoun v. Equifax Inc.*; Cause No.; 1002-263;
14. *Linda Chandler v. Equifax Inc.*; Cause No. 1002-249;
15. *Tamra Chandler v. Equifax Inc.*; Cause No. 1002-248;
16. *Ada Clemons v. Equifax Inc.*; Cause No. 1002-254;
17. *Carlea Clemons v. Equifax Inc.*; Cause No. 1002-266;
18. *Debra Cotton v. Equifax Inc.*; Cause No. 1002-272;
19. *Louise Cotton v. Equifax Inc.*; Cause No. 1002-271;
20. *Linda Crook v. Equifax Inc.*; Cause No. 1002-265;
21. *Samitria Crook v. Equifax Inc.*; Cause No. 1002-264;
22. *Lola Cunningham v. Equifax Inc.*; Cause No. 1002-267;
23. *Lorrie Cunningham v. Equifax Inc.*; Cause No. 1002-270;
24. *Tommy Davis v. Equifax Inc.*; Cause No. 1002-255;
25. *Betty Edmonds v. Equifax Inc.*; Cause No. 1002-256;
26. *Laterris Goodwin v. Equifax Inc.*; Cause No. 1002-257;
27. *Tony Hibbler v. Equifax Inc.*; Cause No. 1002-262;
28. *Debbie Jones v. Equifax Inc.*; Cause No. 1002-259;
29. *Stephen King v. Equifax Inc.*; Cause No. 1002-261;
30. *Ashley Metheny v. Equifax Inc.*; Cause No. 1002-260;
31. *William Shelton v. Equifax Inc.*; Cause No. 1002-258;
32. *Gloria Clemons v. Equifax Inc.*; Cause No. 1002-289;
33. *Earlene Dora v. Equifax Inc.*; Cause No. 1002-281;
34. *Latita Dora v. Equifax Inc.*; Cause No. 1002-283;
35. *Nakimberian Dora v. Equifax Inc.*; Cause No. 1002-280;
36. *Annette Gilkey v. Equifax Inc.*; Cause No. 1002-282;
37. *Antonio Gilkey v. Equifax Inc.*; Cause No. 1002-285;
38. *Travis Gilkey v. Equifax Inc.*; Cause No. 1002-286;
39. *Irene Glenn v. Equifax Inc.*; Cause No. 1002-287;
40. *John Goodwin v. Equifax Inc.*; Cause No. 1002-284;
41. *Phynas Williams v. Equifax Inc.*; Cause No. 1002-288;
42. *Pearlie Mae Allen v. Equifax Inc.*; Cause No. 1002-308;
43. *Victory Allen v. Equifax Inc.*; Cause No. 1002-307;
44. *Pearl Anderson v. Equifax Inc.*; Cause No. 1002-306;
45. *Willie Armistad v. Equifax Inc.*; Cause No. 1002-305;
46. *Henry Barnett v. Equifax Inc.*; Cause No. 1002-304;
47. *Mary Barnett v. Equifax Inc.*; Cause No. 1002-303;
48. *Quinton Beamon v. Equifax Inc.*; Cause No. 1002-302;
49. *Brenda Beasley v. Equifax Inc.*; Cause No. 1002-301;
50. *Rosie Beck v. Equifax Inc.*; Cause No. 1002-300;
51. *Sally Bennett v. Equifax Inc.*; Cause No. 1002-299;
52. *Otha Elston v. Equifax Inc.*; Cause No. 1002-326;
53. *Mary Ervin v. Equifax Inc.*; Cause No. 1002-327;
54. *Lucille Florida v. Equifax Inc.*; Cause No. 1002-320;

- 55. *Ida Foote v. Equifax Inc.*; Cause No. 1002-321;
- 56. *Julie Foote v. Equifax Inc.*; Cause No. 1002-324;
- 57. *Mollie Foote v. Equifax Inc.*; Cause No. 1002-323;
- 58. *Lillie Forte v. Equifax Inc.*; Cause No. 1002-322;
- 59. *Anthony Frierson v. Equifax Inc.*; Cause No. 1002-325;
- 60. *Betty Henley v. Equifax Inc.*; Cause No. 1002-318; and
- 61. *Gary Holman v. Equifax Inc.*; Cause No. 1002-319.

Equifax respectfully asks that the Court hold an emergency telephonic hearing on Equifax's request before the next trial date, July 14, 2020, on 21 cases.

This, the 10th day of July, 2020.

Respectfully submitted,

**EQUIFAX INC.**

By Its Attorneys,  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have, this day, served a true and correct copy of the foregoing via electronic mail to the following counsel of record:

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Dated: July 10, 2020.

  
AMBER L. KIPFMILLER